

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF NEBRASKA

UNITED STATES OF AMERICA,

Plaintiff,

vs.

2020 McLaren 600 LT Spider et. al.,

Defendant.

8:22CR240

MOTION FOR ENTRY OF AN ORDER
FOR INTERLOCUTORY SALE

Pursuant to Rule G(7)(b) of the Supplemental Rules for Admiralty or Maritime Claims and Asset Forfeiture Actions, the Plaintiff, the United States of America, respectfully moves this Court to enter an order authorizing the interlocutory sale of the Defendant Property—i.e. 980 County Road W., Space 1146 Fremont, Nebraska—so that the Defendant Property is converted to United States dollars, the sale proceeds distributed to Claimant Pinnacle Bank in satisfaction of the mortgage loan and cross-collateralization loan of the Defendant Property, and the remaining sale proceeds held in an interest-bearing account by the United States Marshal Service or applicable United States agency pending final resolution of this civil forfeiture case. This motion is consistent with the parties’ joint stipulation, which has been filed with this motion and which has been signed by the Plaintiff United States, Claimant Blake Cook in his capacity as Personal Representative of Brett Cook’s Estate and Trustee of the Brett Cook Revocable Trust, Claimant Pinnacle Bank, and Claimant Darland Properties LLC. In support of this motion, the United States relies on the facts to which the parties have stipulated to in the Joint Stipulation.

WHEREFORE, the parties respectfully requests this Court issue an order for an interlocutory sale of the real property at 980 County Road W., Space 1146 Fremont, Nebraska,

and to direct the sale proceeds be distributed to Claimant Pinnacle Bank in satisfaction of the mortgage loan and cross-collateralization loan of the Defendant Property, and the remaining sale proceeds held in an interest-bearing account by the United States Marshal Service or applicable United States agency pending final resolution of this civil forfeiture case.

UNITED STATES OF AMERICA,
Plaintiff

STEVEN A. RUSSELL
Acting United States Attorney
District of Nebraska

By: s/ Mikala Purdy-Steenholdt

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CERTIFICATE OF SERVICE

I hereby certify that on December 2, 2022, I electronically filed the foregoing with the Clerk of the Court using the CM/ECF system which sent notification of such filing to all parties associated with this case

s/ Mikala Purdy-Steenholdt

Assistant U.S. Attorney